

# **Exhibit “A”**

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## Smith Economics Group, Ltd.

A Division of Corporate Financial Group  
*Economics / Finance / Litigation Support*

Stan V. Smith, Ph.D.  
President

December 10, 2007

Mr. Michael V. Kaplen  
DeCaro & Kaplen  
427 Bedford Rd.  
Pleasantville, NY 10570

Re: Paradi - NEW YORK DAMAGES

Dear Mr. Kaplen:

You have asked me to calculate the value of certain losses subsequent to the death of Sabina Paradi. These losses are: (1) the loss of wages and employee benefits; (2) the loss of replacement household/family services, including (a) the loss of the advice, counsel, guidance, instruction and training services sustained by Ms. Paradi's surviving family; and (b) the loss of accompaniment services sustained by Ms. Paradi's surviving family; and (3) the loss of the value of life ("LVL"), also known as loss of enjoyment of life.

Sabina Paradi was a 23.9-year-old, Caucasian, single female, who was born on April 19, 1983, was injured on February 25, 2007, and died on June 30, 2007. Ms. Paradi's remaining life expectancy as of her date of injury is estimated at 57.4 years. This data is from the National Center for Health Statistics, United States Life Tables, 2003, Vol. 54, No. 14, National Vital Statistics Reports, 2006. I assume an estimated trial or settlement date of April 1, 2008.

In order to perform this evaluation, I have reviewed the following materials: (1) the deposition of Bodo Parady taken on August 23, 2007; (2) the deposition of Mary Moore taken on August 23, 2007; (3) employment records from New York-Presbyterian Hospital; (4) transcripts from the University of California, Berkeley; (5) an interview with Bodo Parady dated December 3, 2007; and (6) the Case Information Form.

My methodology for estimating the losses, which is explained below, is generally based on interest rates, and consumer prices, as well as studies regarding the value of life. The effective net discount rate using statistically average wage growth rates and statistically average discount rates is 0.60 percent.

My estimate of the real wage growth rate is 1.15 percent per year. This growth rate is based on Business Sector, Hourly Compensation growth data from the Major Sector Productivity and Costs Index found at the U.S. Bureau of Labor Statistics website

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at [www.bls.gov/data/home.htm](http://www.bls.gov/data/home.htm), Series ID: PRS84006103, for the real increase in wages primarily for the last 20 years.

My estimate of the real discount rate is 1.75 percent per year. This discount rate is based on the rate of return on 91-day U.S. Treasury Bills published in the Economic Report of the President for the real return on T-Bills primarily for the last 20 years. This rate is also consistent with historical rates published by Ibbotson Associates, Chicago, in its continuously updated series Stocks, Bonds, Bills and Inflation published by Morningstar, Inc. This series, which acknowledges me as the Originator while a Principal and Managing Director at Ibbotson Associates, is generally regarded by academics in the field of finance as the most widely accepted source of statistics on the rates of return on investment securities. It is relied upon almost exclusively by academic and business economists, insurance companies, banks, institutional investors, CPA's, actuaries, benefit analysts, and economists in courts of law.

Estimates of real growth and discount rates are net of inflation based on the Consumer Price Index (CPI-U), published in monthly issues of the U.S. Bureau of Labor Statistics, CPI Detailed Report (Washington, D.C.: U.S. Government Printing Office) and available at the U.S. Bureau of Labor Statistics website at [www.bls.gov/data/home.htm](http://www.bls.gov/data/home.htm), Series ID: CUUR0000SA0. The rate of inflation for the past 20 years has been 3.06 percent.

### I. LOSS OF WAGES AND EMPLOYEE BENEFITS - Full-Time Employment

Tables 1 through 9 show the loss of wages and benefits. Mr. Parady reports that his daughter, Sabina Paradi, graduated from the University of California, Berkeley with a Bachelor's Degree in Nutrition Science. At the time of the accident, Ms. Paradi was attending graduate school at Columbia University and planning to become a certified Dietitian. Additionally, in January of 2007, Ms. Paradi began a fellowship at New York-Presbyterian Hospital, where she was assigned to the Morgan Stanley Children's Hospital. She received a small monthly stipend as well as free housing for her fellowship. Mr. Parady reports that his daughter had been preparing to take the Registered Dietitian Exam. After passing the exam, Ms. Paradi would have been able to practice individually and work with doctors; however, she would have finished her fellowship before starting any full-time employment. Mr. Parady reports that his daughter would have started work as a Registered Dietitian after her fellowship ended in June 2007.

The wage estimate is illustrated to begin in 2007 on the date of the accident at \$935 per month for the remaining three months of her fellowship, based on her monthly stipend of \$650, fringe benefits of \$230 per month, and social security benefits. Ms. Paradi's earnings starting on July 1, 2007 are illustrated at the

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entry level earnings of a Dietitian of \$40,660 in year 2007 dollars. I assume Ms. Paradi's earnings grown in 2013 to the experienced earnings of a Dietitian of \$61,230 in year 2007 dollars. This wage data is based on the New York State Department of Labor, Occupational Employment Statistics found at <http://www.labor.state.ny.ss/workforceindustrydata/apps.asp?reg=ny&app=wages>.

Employee benefit estimates are based on data from the U.S. Chamber of Commerce, 2006 Employee Benefits Study, (Washington, DC: Statistics and Research Center, 2006). I have assumed that employee benefits grow at the same rate as wages and are discounted to present value at the same discount rate. Since these tables assume full-time work, I do not include employee benefits relating to unemployment, injury, illness or disability; benefits starting July 1, 2007 are estimated at 29.5 percent of wages.

Personal consumption is an offset of the income. I use a personal consumption offset based on a study by Patton, Nelson, and Ruble, "Patton-Nelson Personal Consumption Tables 2000-01: Updated and Revised," Journal of Forensic Economics, Vol. 15, No. 3, Fall 2002, pp. 295-301, which shows personal consumption in this case starting June 30, 2007 to be 70.2 percent in 2007 and 2008, 65.8 percent in 2009 and 2010, 62.2 percent in 2011 and 2012, and 59.1 percent in 2013 and thereafter for a 1-person household.

I assume full-time employment each year and show the accumulation through life expectancy. While these tables are calculated through the end of life expectancy, the losses from working full-time through any assumed retirement age can be read off the table.

Based on the above assumptions, my opinion of the wage loss for full-time employment is \$1,572,213 ▶ Table 9. This figure assumes full-time work to age 81.3, but any assumed retirement age may be read from Table 9. For example, the full-time employment wage loss to age 67 is \$1,233,425.

## II. LOSS OF REPLACEMENT HOUSEHOLD/FAMILY SERVICES

The following sections estimate the value of replacement household/family services provided to Sabina Paradi's parents. These services do not include loss of love, care, or affection, etc., but are the tangible services, valued as if they were provided by a person unknown to the household. A discussion of these services can be found in the Household Replacement Services Appendix. The hourly value of these services grows at the same rate as wages and is discounted at the same rates as wages.

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### II(A). LOSS OF HOUSEHOLD/FAMILY ADVICE, COUNSEL, GUIDANCE, INSTRUCTION AND TRAINING SERVICES

Tables 10 through 15 show the pecuniary loss of advice, counsel, guidance, instruction and training services sustained by Ms. Paradi's parents using the market-based replacement-cost method. Valuing the tangible, economic loss of household family services beyond the physical housekeeping chores is well-recognized in the economic literature and in caselaw. See, for example, Frank D. Tinari, "Household Services: Toward a More Comprehensive Measure," Journal of Forensic Economics, Vol. 11, No. 3, Fall 1998, pp. 253-265, and Michigan Central v. Vreeland discussed in the Household Replacement Services Appendix. The hourly value of the loss is based on the mean hourly earnings of educational, vocational, and school counselors; marriage and family therapists; child, family and school social workers; social and human service assistants; clergy; directors of religious activities and education; coaches; and elementary school teachers, which is \$19.53 per hour in year 2006 dollars. This wage data is based on information from the U.S. Bureau of Labor Statistics, Occupational Employment Statistics, May 2006 National Occupational Employment and Wage Statistics found at [www.bls.gov/oes](http://www.bls.gov/oes). I value such services at their replacement cost which includes a conservative estimate of 50 percent hourly overhead reasonably charged by agencies who supply such services on a part-time basis, and who are responsible for advertising, vetting, hiring, training, insuring and bonding the part-time employee, and who are also responsible for payroll-related costs such as the employer's share of social security contributions, etc.

Based on a benchmark loss of 1.0 hour per week for each family member, my opinion of the loss of advice, counsel, guidance, instruction and training as a result of the death of Sabina Paradi is as follows:

\$33,414 ► Table 12 for Bodo Parady;  
\$41,969 ► Table 15 for Mary Moore.

### II(B). LOSS OF HOUSEHOLD/FAMILY ACCOMPANIMENT SERVICES

Tables 16 through 21 show the pecuniary loss of accompaniment services sustained by Ms. Paradi's parents using the market-based replacement-cost method. Valuing the tangible economic loss of household family services beyond physical housekeeping chores is well-recognized in the economic literature and in caselaw. See, for example, Frank D. Tinari, "Household Services: Toward a More Comprehensive Measure," Journal of Forensic Economics, Vol. 11, No. 3, Fall 1998, pp. 253-265, and Michigan Central v. Vreeland discussed in the Household Replacement Services Appendix. The hourly value of the loss of accompaniment is based on the mean

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hourly earnings of licensed practical and licensed vocational nurses; home health aides; and personal and home care aides, which is \$12.15 per hour in year 2006 dollars. This wage data is based on information from the U.S. Bureau of Labor Statistics, Occupational Employment Statistics, May 2006 National Occupational Employment and Wage Statistics found at [www.bls.gov/oes](http://www.bls.gov/oes). I value such services at their replacement cost which includes a conservative estimate of 50 percent hourly overhead reasonably charged by agencies who supply such services on a part-time basis, and who are responsible for advertising, vetting, hiring, training, insuring and bonding the part-time employee, and who are also responsible for payroll-related costs such as the employer's share of social security contributions, etc.

Based on a benchmark loss of 168 hours per year for each family member, my opinion of the loss of accompaniment as a result of the death of Sabina Paradi is as follows:

\$67,192 ▶ Table 18 for Bodo Parady;  
\$84,384 ▶ Table 21 for Mary Moore.

### III. LOSS OF VALUE OF LIFE

Economists have long agreed that life is valued at more than the lost earnings capacity. My estimate of the value of life is based on many economic studies on what we, as a contemporary society, actually pay to preserve the ability to lead a normal life. The studies examine incremental pay for risky occupations as well as a multitude of data regarding expenditure for life savings by individuals, industry, and state and federal agencies. Based on the average value of a statistical life and life expectancy of 81.3 years, my opinion of the loss of the value of life for Sabina Paradi is \$5,060,628.

My estimate of the value of life is consistent with estimates published in other studies that examine and review the broad spectrum of economic literature on the value of life. Among these is "The Plausible Range for the Value of Life," Journal of Forensic Economics, Vol. 3, No. 3, Fall 1990, pp. 17-39, by T. R. Miller. This study reviews 67 different estimates of the value of life published by economists in peer-reviewed academic journals. The results, in most instances, show the value of life to range from approximately \$1.6 million to \$2.9 million dollars in year 1988 after-tax dollars, with a mean of approximately \$2.2 million dollars. In "The Value of Life: Estimates with Risks by Occupation and Industry," Harvard University, John M. Olin Center for Law, Economics, and Business, No. 442, May 2003, Professor W. K. Viscusi estimates the value of life to be approximately \$4.7 million dollars in year 2000 dollars.



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Because it is generally accepted by economists, the methodology used to estimate the value of life has been found to meet Daubert standards, as well as Frye standards and the Rules of Evidence in various states, by Federal Circuit and Appellate courts, as well as state trial, supreme and appellate courts nationwide. Testimony based on this peer-reviewed methodology has been admitted in over half the states in over 175 trials nationwide. Proof of general acceptance and other standards is found in a discussion of the extensive references to the scientific economic peer-reviewed literature on the value of life listed in the Value of Life Appendix to this report.

The underlying, academic, peer-reviewed studies fall into two general groups: (1) consumer behavior and purchases of safety devices; (2) wage risk premiums to workers; in addition, there is a third group of studies consisting of cost-benefit analyses of regulations. For example, one consumer safety study analyzes the costs of smoke detectors and the lifesaving reduction associated with them. One wage premium study examines the differential rates of pay for dangerous occupations with a risk of death on the job. Just as workers receive shift premiums for undesirable work hours, workers also receive a higher rate of pay to accept a increased risk of death on the job. A study of government regulation examines the lifesaving resulting from the installation of smoke stack scrubbers at high-sulphur, coal-burning power plants. As a hypothetical example of the methodology, assume that a safety device costs \$460 and results in lowering a person's risk of premature death by one chance in 5,000. The cost per life saved is obtained by dividing \$460 by the one in 5,000 probability, yielding \$2,300,000. Overall, based on the peer-reviewed economic literature, I estimate the central tendency of the range of the economic studies to be approximately \$3.9 million in year 2007 dollars.

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A trier-of-fact may weigh other factors to determine if these estimated losses for Sabina Paradi should be adjusted because of special qualities or circumstances that economists do not as yet have a methodology for analysis.

In each set of tables, the estimated losses are calculated from February 25, 2007 through an assumed trial or settlement date of April 1, 2008, and from that date thereafter. The last table in each set accumulates the past and future estimated losses. These estimates are provided as an aid, tool and guide for the trier-of-fact.

All opinions expressed in this report are clearly labeled as such. They are rendered in accordance with generally accepted standards within the field of economics, and are expressed to a reasonable degree of economic certainty. Estimates, assumptions,

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illustrations and the use of benchmarks, which are not opinions (but which can be viewed as hypothetical in nature) are also clearly identified.

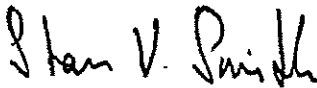
In my opinion, it is reasonable for experts in the field of economics and finance to rely on the materials and information I reviewed in this case, for the formulation of my substantive opinions herein.

If there is additional information which I have not yet taken into account and which could alter my opinions, please let me know so that I may incorporate any such information into an update of the opinions expressed in this report.

If any additional information becomes available in the future which could alter my opinions, again, please let me know so that I may incorporate any such information into an update of the opinions expressed in this report.

If you have any questions, please do not hesitate to call me.

Sincerely,



Stan V. Smith, Ph.D.  
President



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## APPENDIX: HOUSEHOLD REPLACEMENT SERVICES

Courts have long recognized that members's claims to the value of tangible family household replacement services as an element of damages in personal injury and wrongful death cases, as an aspect of the pecuniary loss in such cases. These services are those that are provided by the injured family member to other family members without charge or cost. Members who receive such services can include spouses, children, parents or siblings; such family members do not necessarily have to reside in the same household to receive such services.

Courts have also long recognized that an appropriate method in valuing such tangible services is to value their replacement costs by examining costs paid in labor markets that provide generally comparable services for. "[T]he service must have market equivalents from which a pecuniary standard can be established ..." This standard is set forth in the 1913 U.S. Supreme Court Decision, Michigan Central Railroad Company v. Vreeland, 227 U.S. 59 (1913). So this method is a century old.

The Supreme Court's suggesting in valuing compensable services in the Vreeland decision is a standard that is not rigid, but actually rather general: "[The] pecuniary loss or damage must be one which can be measured by some standard.... Compensation for such loss manifestly does not include damages by way of recompense for grief or wounded feelings." Michigan Central v. Vreeland.

Examples of lost household services that used to be performed by victims (whether fatally or non-fatally injured) can include physical chores such as mowing the lawn, painting the house, cleaning the windows, doing the laundry, washing and repairing the car, preparing the meals and doing the dishes, among others. For many decades economists have met the Supreme Court's general standard by using labor market equivalents for cooks, laundry workers, gardeners, maids, etc. in valuing the physical chores regarding housekeeping services.

Additionally, economists have recognized that tangible services to family members include services well beyond the physical housekeeping chores. For example, William G. Jungbauer and Mark J. Odegard, in Maximizing Recovery in FELA Wrongful Death Actions, in Assessing Family Loss in Wrongful Death Litigation: The Special Roles of Lost Services and Personal Consumption, Lawyers & Judges Publishing Co., 1999, pp. 284, indicate that a complete analysis of all services performed by family members includes much, much more than the physical housekeeping chores. Frank D. Tinari, in a peer-reviewed, scientific, economic journal article "Household Services: Toward a More Comprehensive Measure," Journal of Forensic Economics, Vol. 11, No. 3, Fall 1998, pp. 253-265, expresses the same view.

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Jungbauer and Odegard indicate that a victim may have provided services of many other professions such as that of a chauffeur, driving other family members to appointments, or that of a security guard, especially regarding the injury to a male spouse, etc. Every family member acts as a companion to other family members. And it is common for family members to act as counselors for one another, typically providing advice and counsel on important personal, family, medical, financial, career or other issues. The marketplace can and does value such items of loss. If the victim cannot provide these services, or does so at a reduced capacity or rate, there is a distinct and definite loss to the other family members. These losses have a definite and easily measurable pecuniary value. Vreeland requires only that a "reasonable expectation" of loss of services be proven and that such loss be valued by some standard, presumably a reasonably-based economic standard, to allow recovery.

The economic literature on recovery of loss of services discusses a market-oriented replacement-cost method to assess the pecuniary value of the loss of accompaniment services, as well as the value of advice, guidance and counsel services that family members provide to one another, within a broadly defined scope of family services. See, for example, Frank D. Tinari, "Household Services: Toward a More Comprehensive Measure, " Journal of Forensic Economics, Vol. 11, No. 3, Fall 1998, pp. 253-265.

Finally, according to Chief Justice Robert Wilentz of the Supreme Court of New Jersey, in Green v. Bittner, 85 NJ 1, 1980, pp. 12, accompaniment services, to be compensable, must be that which would have provided services substantially equivalent to those provided by the companions often hired today by the aged or infirm, or substantially equivalent to services provided by nurses or practical nurses; and its value must be confined to what the marketplace would pay a stranger with similar qualifications for performing such services.

In valuing the household replacement services that are provided by family members to one another, beyond the physical housekeeping chores, both the U.S Supreme Court and the New Jersey Supreme Court discuss looking at labor markets for the equivalent value of such services. This methodology is identical to the traditional approach that economists have been using for over four decades in valuing the physical chores involved in housekeeping services.

Note: While in some states such as New Jersey such losses are not available in non-fatal injury cases, such losses may apply in any injury case, whether fatal or not. 7A2

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## APPENDIX: VALUE OF LIFE

The economic methodology for the valuation of life has been found to meet the Daubert and Frye standards by many courts, along with the Rules of Evidence in many states nationwide. My testimony has been accepted in approximately 175 state and federal jurisdictions nationwide in over half the states. Testimony has been accepted by Federal circuit and Appellate courts as well as in state trial, supreme, and appellate Courts. The Daubert standard sets forth four criteria:

1. Testing of the theory and science
2. Peer Review
3. Known or potential rate of error
4. Generally accepted.

Testing of the theory and science has been accomplished over the past four decades, since the 1960s. Dozens of economists of high renown have published over a hundred articles in high quality, peer-reviewed economic journals measuring the value of life. The value of life theories are perhaps among the most well-tested in the field of economics, as evidenced by the enormous body of economic scientific literature that has been published in the field and is discussed below.

Peer Review of the concepts and methodology have been extraordinarily extensive. One excellent review of this extensive, peer-reviewed literature can be found in "The Value of Risks to Life and Health," W. K. Viscusi, Journal of Economic Literature, Vol. 31, December 1993, pp. 1912-1946. A second is "The Value of a Statistical Life: A Critical Review of Market Estimates throughout the World." W. K. Viscusi and J. E. Aldy, Journal of Risk and Uncertainty, Vol. 27, No. 1, November 2002, pp. 5-76. Additional theoretical and empirical work by Viscusi, a leading researcher in the field, can be found in: "The Value of Life", W. K. Viscusi, John M. Olin Center for Law, Economics, and Business, Harvard Law School, Discussion Paper No. 517, June 2005. An additional peer-reviewed article discusses the application to forensic economics: "The Plausible Range for the Value of Life," T. R. Miller, Journal of Forensic Economics, Vol. 3, No. 3, Fall 1990, pp. 17-39, which discusses the many dozens of articles published in other peer-reviewed economic journals on this topic. This concept is discussed in detail in "Willingness to Pay Comes of Age: Will the System Survive?" T. R. Miller, Northwestern University Law Review, Summer 1989, pp. 876-907, and "Hedonic Damages in Personal Injury and Wrongful Death Litigation," by S. V. Smith in Litigation Economics, pp. 39-59.

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Kenneth Arrow, a Nobel Laureate in economics, discusses this method for valuing life in "Invaluable Goods," Journal of Economic Literature, Vol. 35, No. 2, 1997, pp. 759.

The known or potential rate of error is well researched. All of these articles discuss the known or potential rate of error, well within the acceptable standard in the field of economics, generally using a 95% confidence rate for the statistical testing and acceptance of results. There are few areas in the field of economics where the known or potential rate of error has been as well-accepted and subject to more extensive investigation.

General Acceptance of the concepts and methodology on the value of life in the field of economics is extensive. This methodology is and has been generally accepted in the field of economics for many years. Indeed, according to the prestigious and highly-regarded research institute, The Rand Corporation, by 1988, the peer-reviewed scientific methods for estimating the value of life were well-accepted: "Most economists would agree that the willingness-to-pay methodology is the most conceptually appropriate criterion for establishing the value of life," Computing Economic loss in Cases of Wrongful Death, King and Smith, Rand Institute for Civil Justice, R-3549-ICJ, 1988.

While first discussed in cutting edge, peer-reviewed economic journals, additional proof of general acceptance is now indicated by the fact that this methodology is now taught in standard economics courses at the undergraduate and graduate level throughout hundreds of colleges and universities nationwide as well as the fact that it is taught and discussed in widely-accepted textbooks in the field of law and economics: Economics, Sixth Edition, David C. Colander, McGraw-Hill Irwin, Boston, 2006, pp. 463-465; this introductory economics textbook is the third most widely used textbook in college courses nationwide. Hamermesh and Rees's The Economics of Work and Pay, Harper-Collins, 1993, Chapter 13, a standard advanced textbook in labor economics, also discusses the methodology for valuing life. Other textbooks discuss this topic as well. Richard Posner, a Justice and former Chief Justice of the U.S. Court of Appeals for the highly regarded 7th Circuit and Senior Lecturer at the University of Chicago Law School, one of most prolific legal writers in America, details the Value of Life approach in his widely used textbooks: Economic Analysis of Law, 1986, Little Brown & Co., pp. 182-185 and Tort Law, 1982, Little Brown & Co., pp. 120-126.

As further evidence of general acceptance in the field, many surveys published in the field of forensic economics show that hundreds of economics nationwide are now familiar with this methodology and are available to prepare (and critique) forensic economic value of life estimates. Indeed, many economists who



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indicate they will prepare such analysis for plaintiffs also are willing to critique such analysis for defendants, as I have often done. That an economist is willing to critique a report does not indicate that he or she is opposed to the concept or the methodology, but merely available to assure that the plaintiff economist has employed proper techniques. The fact that there are economists who indicate they do not prepare estimates of value of life is again no indication that they oppose the methodology: many claim they are not familiar with the literature and untrained in this area. While some CPAs and others without a degree in economics have opposed these methods, such professionals do not have the requisite academic training and are unqualified to make such judgements. However, as in any field of economics, this area is not without controversy and there are some qualified and trained economists who dispute certain aspects of the methodology. General acceptance does not mean universal acceptance.

Additional evidence of general acceptance in the field is found in the teaching of the concepts regarding the value of life. Forensic Economics is now taught as a special field in a number of institutions nationwide. I taught what is believed to be the first course ever presented in the field of Forensic Economics at DePaul University in Spring, 1990. My own book, Economic/Hedonic Damages, Anderson, 1990, and supplemental updates thereto, co-authored with Dr. Michael Brookshire, a Professor of Economics in West Virginia, has been used as a textbook in at least 5 colleges and universities nationwide in such courses in economics, and has a thorough discussion of the methodology. Toppino et. al., in "Forensic Economics in the Classroom," published in The Earnings Analyst, Journal of the American Rehabilitation Economics Association, Vol. 4, 2001, pp. 53-86, indicate that hedonic damages is one of 15 major topic areas taught in such courses.

Lastly, general acceptance is found by examining publications in the primary journal in the field of Forensic Economics, which is the peer-reviewed Journal of Forensic Economics, where there have been published many articles on the value of life. Some are cited above. Others include: "The Econometric Basis for Estimates of the Value of Life," W. K. Viscusi, Vol 3, No. 3, Fall 1990, pp. 61-70; "Hedonic Damages in the Courtroom Setting." S. V. Smith, Vol. 3, No. 3, Fall 1990, pp. 41-49; "Issues Affecting the Calculated Value of Life," E. P. Berla, M. L. Brookshire and S. V. Smith, Vol 3, No. 1, 1990, pp. 1-8; "Hedonic Damages and Personal Injury: A Conceptual Approach." G. R. Albrecht, Vol. 5., No. 2, Spring/Summer 1992, pp. 97-104; "The Application of the Hedonic Damages Concept to Wrongful and Personal Injury Litigation." G. R. Albrecht, Vol. 7, No. 2, Spring/Summer 1994, pp. 143-150; and also "A Review of the Monte Carlo Evidence Concerning Hedonic Value of Life Estimates," R. F. Gilbert, Vol. 8, No. 2, Spring/Summer 1995, pp. 125-130.

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It is important to note that this methodology is endorsed and employed by the U. S. Government as the standard and recommended approach for use by all U. S. Agencies in valuing life for policy purposes, as mandated in current and past Presidential Executive Orders in effect since 1972, and as discussed in "Report to Congress on the Costs and Benefits of Federal Regulations," Office of Management and Budget, 1998, and "Economic Analysis of Federal Regulations Under Executive Order 12866," Executive Office of the President, Office of Management and Budget, pp. 1-37, and "Report to the President on Executive Order No. 12866," Regulatory Planning and Review, May 1, 1994, Office of Information and Regulatory Affairs, Office of Management and Budget. Prior presidents signed similar orders as discussed in "Federal Agency Valuations of Human life," Administrative Conference of the United States, Report for Recommendation 88-7, December 1988, pp. 368-408. 7911



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## SUMMARY OF LOSSES FOR SABINA PARADI

TABLE *****	DESCRIPTION *****	ESTIMATE *****
	<u>EARNINGS</u>	
	LOSS OF WAGES & BENEFITS, NET OF PERSONAL CONSUMPTION	
9	Full-Time Employment to age 67	\$1,233,425
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	<u>HOUSEHOLD/FAMILY REPLACEMENT SERVICES</u>	
	LOSS OF HOUSEHOLD/FAMILY GUIDANCE SERVICES	
12	Bodo Parady	\$ 33,414
15	Mary Moore	\$ 41,969
	LOSS OF HOUSEHOLD/FAMILY ACCOMPANIMENT SERVICES	
18	Bodo Parady	\$ 67,192
21	Mary Moore	\$ 84,384
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	<u>LOSS OF ENJOYMENT OF LIFE</u>	
	LOSS OF VALUE OF LIFE	\$5,060,628

The information on this Summary of Losses is intended to summarize losses under certain given assumptions. Please refer to the report and the tables for all the opinions.

Table 1

LOSS OF PAST WAGES  
2007 - 2008

YEAR	AGE	WAGES	CUMULATE
****	***	*****	*****
2007	24	\$23,191	\$23,191
2008	25	10,910	\$34,101
PARADI		\$34,101	

Table 2

LOSS OF PAST EMPLOYEE BENEFITS  
2007 - 2008

YEAR	AGE	EMPLOYEE BENEFITS	CUMULATE
****	***	*****	*****
2007	24	\$4,061	\$4,061
2008	25	3,219	\$7,280
PARADI		\$7,280	

Table 3

LOSS OF PAST PERSONAL CONSUMPTION  
2007 - 2008

YEAR	AGE	PERSONAL CONSUMPTION	CUMULATE
****	***	*****	*****
2007	24	-\$12,514	-\$12,514
2008	25	-9,918	-\$22,432
PARADI		-\$22,432	

Table 4

ECONOMIC LOSS TO DATE  
2007 - 2008

YEAR	AGE	WAGES	EMPLOYEE BENEFITS	PERSONAL CONSUMPTION	TOTAL	CUMULATE
****	***	*****	*****	*****	*****	*****
2007	24	\$23,191	\$4,061	-\$12,514	\$14,738	\$14,738
2008	25	10,910	3,219	-9,918	4,211	\$18,949
PARADI		\$34,101	\$7,280	-\$22,432	\$18,949	

Table 5

PRESENT VALUE OF FUTURE WAGES  
2008 - 2064

YEAR	AGE	WAGES	DISCOUNT FACTOR	PRESENT VALUE	CUMULATE
****	***	*****	*****	*****	*****
2008	25	\$33,337	0.98699	\$32,903	\$32,903
2009	26	48,150	0.97001	46,706	79,609
2010	27	52,397	0.95333	49,952	129,561
2011	28	57,019	0.93693	53,423	182,984
2012	29	62,049	0.92082	57,136	240,120
2013	30	67,523	0.90498	61,107	301,227
2014	31	68,300	0.88942	60,747	361,974
2015	32	69,085	0.87412	60,389	422,363
2016	33	69,879	0.85908	60,032	482,395
2017	34	70,683	0.84431	59,678	542,073
2018	35	71,496	0.82979	59,327	601,400
2019	36	72,318	0.81552	58,977	660,377
2020	37	73,150	0.80149	58,629	719,006
2021	38	73,991	0.78771	58,283	777,289
2022	39	74,842	0.77416	57,940	835,229
2023	40	75,703	0.76084	57,598	892,827
2024	41	76,574	0.74776	57,259	950,086
2025	42	77,455	0.73490	56,922	1,007,008
2026	43	78,346	0.72226	56,586	1,063,594
2027	44	79,247	0.70983	56,252	1,119,846
2028	45	80,158	0.69763	55,921	1,175,767
2029	46	81,080	0.68563	55,591	1,231,358
2030	47	82,012	0.67384	55,263	1,286,621
2031	48	82,955	0.66225	54,937	1,341,558
2032	49	83,909	0.65086	54,613	1,396,171
2033	50	84,874	0.63966	54,291	1,450,462
2034	51	85,850	0.62866	53,970	1,504,432
2035	52	86,837	0.61785	53,652	1,558,084
2036	53	87,836	0.60722	53,336	1,611,420
2037	54	88,846	0.59678	53,022	1,664,442
2038	55	89,868	0.58651	52,708	1,717,150
2039	56	90,901	0.57643	52,398	1,769,548
2040	57	91,946	0.56651	52,088	1,821,636
2041	58	93,003	0.55677	51,781	1,873,417
2042	59	94,073	0.54719	51,476	1,924,893
2043	60	95,155	0.53778	51,172	1,976,065
2044	61	96,249	0.52853	50,870	2,026,935
2045	62	97,356	0.51944	50,571	2,077,506
2046	63	98,476	0.51051	50,273	2,127,779
2047	64	99,608	0.50173	49,976	2,177,755
2048	65	100,753	0.49310	49,681	2,227,436
2049	66	101,912	0.48462	49,389	2,276,825
2050	67	103,084	0.47628	49,097	2,325,922
2051	68	104,269	0.46809	48,807	2,374,729
2052	69	105,468	0.46004	48,519	2,423,248
2053	70	106,681	0.45213	48,234	2,471,482
2054	71	107,908	0.44435	47,949	2,519,431
2055	72	109,149	0.43671	47,666	2,567,097
2056	73	110,404	0.42920	47,385	2,614,482
2057	74	111,674	0.42182	47,106	2,661,588



Table 5 (Cont.)

PRESENT VALUE OF FUTURE WAGES  
2008 - 2064

YEAR	AGE	WAGES	DISCOUNT FACTOR	PRESENT VALUE	CUMULATE
****	***	*****	*****	*****	*****
2058	75	112,958	0.41456	46,828	2,708,416
2059	76	114,257	0.40743	46,552	2,754,968
2060	77	115,571	0.40043	46,278	2,801,246
2061	78	116,900	0.39354	46,005	2,847,251
2062	79	118,244	0.38677	45,733	2,892,984
2063	80	119,604	0.38012	45,464	2,938,448
2064	81	71,925	0.37620	27,058	\$2,965,506
SABINA PARADI				\$2,965,506	

Table 6

PRESENT VALUE OF FUTURE EMPLOYEE BENEFITS  
2008 - 2064

YEAR	AGE	EMPLOYEE BENEFITS	DISCOUNT FACTOR	PRESENT VALUE	CUMULATE
****	***	*****	*****	*****	*****
2008	25	\$9,834	0.98699	\$9,707	\$9,707
2009	26	14,204	0.97001	13,778	23,485
2010	27	15,457	0.95333	14,736	38,221
2011	28	16,821	0.93693	15,760	53,981
2012	29	18,304	0.92082	16,855	70,836
2013	30	19,919	0.90498	18,026	88,862
2014	31	20,149	0.88942	17,921	106,783
2015	32	20,380	0.87412	17,815	124,598
2016	33	20,614	0.85908	17,709	142,307
2017	34	20,851	0.84431	17,605	159,912
2018	35	21,091	0.82979	17,501	177,413
2019	36	21,334	0.81552	17,398	194,811
2020	37	21,579	0.80149	17,295	212,106
2021	38	21,827	0.78771	17,193	229,299
2022	39	22,078	0.77416	17,092	246,391
2023	40	22,332	0.76084	16,991	263,382
2024	41	22,589	0.74776	16,891	280,273
2025	42	22,849	0.73490	16,792	297,065
2026	43	23,112	0.72226	16,693	313,758
2027	44	23,378	0.70983	16,594	330,352
2028	45	23,647	0.69763	16,497	346,849
2029	46	23,919	0.68563	16,400	363,249
2030	47	24,194	0.67384	16,303	379,552
2031	48	24,472	0.66225	16,207	395,759
2032	49	24,753	0.65086	16,111	411,870
2033	50	25,038	0.63966	16,016	427,886
2034	51	25,326	0.62866	15,921	443,807
2035	52	25,617	0.61785	15,827	459,634
2036	53	25,912	0.60722	15,734	475,368
2037	54	26,210	0.59678	15,642	491,010
2038	55	26,511	0.58651	15,549	506,559
2039	56	26,816	0.57643	15,458	522,017
2040	57	27,124	0.56651	15,366	537,383
2041	58	27,436	0.55677	15,276	552,659
2042	59	27,752	0.54719	15,186	567,845
2043	60	28,071	0.53778	15,096	582,941
2044	61	28,393	0.52853	15,007	597,948
2045	62	28,720	0.51944	14,918	612,866
2046	63	29,050	0.51051	14,830	627,696
2047	64	29,384	0.50173	14,743	642,439
2048	65	29,722	0.49310	14,656	657,095
2049	66	30,064	0.48462	14,570	671,665
2050	67	30,410	0.47628	14,484	686,149
2051	68	30,759	0.46809	14,398	700,547
2052	69	31,113	0.46004	14,313	714,860
2053	70	31,471	0.45213	14,229	729,089
2054	71	31,833	0.44435	14,145	743,234
2055	72	32,199	0.43671	14,062	757,296
2056	73	32,569	0.42920	13,979	771,275
2057	74	32,944	0.42182	13,896	785,171

Table 6 (Cont.)

PRESENT VALUE OF FUTURE EMPLOYEE BENEFITS  
2008 - 2064

YEAR	AGE	EMPLOYEE BENEFITS	DISCOUNT FACTOR	PRESENT VALUE	CUMULATE
****	***	*****	*****	*****	*****
2058	75	33,323	0.41456	13,814	798,985
2059	76	33,706	0.40743	13,733	812,718
2060	77	34,093	0.40043	13,652	826,370
2061	78	34,486	0.39354	13,572	839,942
2062	79	34,882	0.38677	13,491	853,433
2063	80	35,283	0.38012	13,412	866,845
2064	81	21,218	0.37620	7,982	\$874,827
SABINA PARADI				\$874,827	

Table 7

PRESENT VALUE OF FUTURE PERSONAL CONSUMPTION  
2008 - 2064

YEAR	AGE	PERSONAL CONSUMPTION	DISCOUNT FACTOR	PRESENT VALUE	CUMULATE
****	***	*****	*****	*****	*****
2008	25	-\$30,307	0.98699	-\$29,912	-\$29,912
2009	26	-41,029	0.97001	-39,799	-69,711
2010	27	-44,647	0.95333	-42,563	-112,274
2011	28	-45,929	0.93693	-43,032	-155,306
2012	29	-49,980	0.92082	-46,023	-201,329
2013	30	-51,675	0.90498	-46,765	-248,094
2014	31	-52,270	0.88942	-46,490	-294,584
2015	32	-52,871	0.87412	-46,216	-340,800
2016	33	-53,478	0.85908	-45,942	-386,742
2017	34	-54,094	0.84431	-45,672	-432,414
2018	35	-54,716	0.82979	-45,403	-477,817
2019	36	-55,345	0.81552	-45,135	-522,952
2020	37	-55,982	0.80149	-44,869	-567,821
2021	38	-56,625	0.78771	-44,604	-612,425
2022	39	-57,277	0.77416	-44,342	-656,767
2023	40	-57,936	0.76084	-44,080	-700,847
2024	41	-58,602	0.74776	-43,820	-744,667
2025	42	-59,276	0.73490	-43,562	-788,229
2026	43	-59,958	0.72226	-43,305	-831,534
2027	44	-60,648	0.70983	-43,050	-874,584
2028	45	-61,345	0.69763	-42,796	-917,380
2029	46	-62,051	0.68563	-42,544	-959,924
2030	47	-62,764	0.67384	-42,293	-1,002,217
2031	48	-63,485	0.66225	-42,043	-1,044,260
2032	49	-64,216	0.65086	-41,796	-1,086,056
2033	50	-64,954	0.63966	-41,548	-1,127,604
2034	51	-65,701	0.62866	-41,304	-1,168,908
2035	52	-66,456	0.61785	-41,060	-1,209,968
2036	53	-67,221	0.60722	-40,818	-1,250,786
2037	54	-67,994	0.59678	-40,577	-1,291,363
2038	55	-68,776	0.58651	-40,338	-1,331,701
2039	56	-69,567	0.57643	-40,101	-1,371,802
2040	57	-70,366	0.56651	-39,863	-1,411,665
2041	58	-71,175	0.55677	-39,628	-1,451,293
2042	59	-71,994	0.54719	-39,394	-1,490,687
2043	60	-72,822	0.53778	-39,162	-1,529,849
2044	61	-73,659	0.52853	-38,931	-1,568,780
2045	62	-74,507	0.51944	-38,702	-1,607,482
2046	63	-75,364	0.51051	-38,474	-1,645,956
2047	64	-76,230	0.50173	-38,247	-1,684,203
2048	65	-77,106	0.49310	-38,021	-1,722,224
2049	66	-77,993	0.48462	-37,797	-1,760,021
2050	67	-78,890	0.47628	-37,574	-1,797,595
2051	68	-79,797	0.46809	-37,352	-1,834,947
2052	69	-80,715	0.46004	-37,132	-1,872,079
2053	70	-81,643	0.45213	-36,913	-1,908,992
2054	71	-82,582	0.44435	-36,695	-1,945,687
2055	72	-83,532	0.43671	-36,479	-1,982,166
2056	73	-84,492	0.42920	-36,264	-2,018,430
2057	74	-85,464	0.42182	-36,050	-2,054,480

Table 7 (Cont.)

PRESENT VALUE OF FUTURE PERSONAL CONSUMPTION  
2008 - 2064

YEAR	AGE	PERSONAL CONSUMPTION	DISCOUNT FACTOR	PRESENT VALUE	CUMULATE
****	***	*****	*****	*****	*****
2058	75	-86,447	0.41456	-35,837	-2,090,317
2059	76	-87,441	0.40743	-35,626	-2,125,943
2060	77	-88,446	0.40043	-35,416	-2,161,359
2061	78	-89,464	0.39354	-35,208	-2,196,567
2062	79	-90,492	0.38677	-35,000	-2,231,567
2063	80	-91,533	0.38012	-34,794	-2,266,361
2064	81	-55,044	0.37620	-20,708	-\$2,287,069
SABINA PARADI				-\$2,287,069	

Table 8

PRESENT VALUE OF FUTURE WAGES AND BENEFITS  
2008 - 2064

YEAR	AGE	WAGES	EMPLOYEE BENEFITS	PERSONAL CONSUMPTION	TOTAL	CUMULATE
****	***	*****	*****	*****	*****	*****
2008	25	\$32,903	\$9,707	-\$29,912	\$12,698	\$12,698
2009	26	46,706	13,778	-39,799	20,685	33,383
2010	27	49,952	14,736	-42,563	22,125	55,508
2011	28	53,423	15,760	-43,032	26,151	81,659
2012	29	57,136	16,855	-46,023	27,968	109,627
2013	30	61,107	18,026	-46,765	32,368	141,995
2014	31	60,747	17,921	-46,490	32,178	174,173
2015	32	60,389	17,815	-46,216	31,988	206,161
2016	33	60,032	17,709	-45,942	31,799	237,960
2017	34	59,678	17,605	-45,672	31,611	269,571
2018	35	59,327	17,501	-45,403	31,425	300,996
2019	36	58,977	17,398	-45,135	31,240	332,236
2020	37	58,629	17,295	-44,869	31,055	363,291
2021	38	58,283	17,193	-44,604	30,872	394,163
2022	39	57,940	17,092	-44,342	30,690	424,853
2023	40	57,598	16,991	-44,080	30,509	455,362
2024	41	57,259	16,891	-43,820	30,330	485,692
2025	42	56,922	16,792	-43,562	30,152	515,844
2026	43	56,586	16,693	-43,305	29,974	545,818
2027	44	56,252	16,594	-43,050	29,796	575,614
2028	45	55,921	16,497	-42,796	29,622	605,236
2029	46	55,591	16,400	-42,544	29,447	634,683
2030	47	55,263	16,303	-42,293	29,273	663,956
2031	48	54,937	16,207	-42,043	29,101	693,057
2032	49	54,613	16,111	-41,796	28,928	721,985
2033	50	54,291	16,016	-41,548	28,759	750,744
2034	51	53,970	15,921	-41,304	28,587	779,331
2035	52	53,652	15,827	-41,060	28,419	807,750
2036	53	53,336	15,734	-40,818	28,252	836,002
2037	54	53,022	15,642	-40,577	28,087	864,089
2038	55	52,708	15,549	-40,338	27,919	892,008
2039	56	52,398	15,458	-40,101	27,755	919,763
2040	57	52,088	15,366	-39,863	27,591	947,354
2041	58	51,781	15,276	-39,628	27,429	974,783
2042	59	51,476	15,186	-39,394	27,268	1,002,051
2043	60	51,172	15,096	-39,162	27,106	1,029,157
2044	61	50,870	15,007	-38,931	26,946	1,056,103
2045	62	50,571	14,918	-38,702	26,787	1,082,890
2046	63	50,273	14,830	-38,474	26,629	1,109,519
2047	64	49,976	14,743	-38,247	26,472	1,135,991
2048	65	49,681	14,656	-38,021	26,316	1,162,307
2049	66	49,389	14,570	-37,797	26,162	1,188,469
2050	67	49,097	14,484	-37,574	26,007	1,214,476
2051	68	48,807	14,398	-37,352	25,853	1,240,329
2052	69	48,519	14,313	-37,132	25,700	1,266,029
2053	70	48,234	14,229	-36,913	25,550	1,291,579
2054	71	47,949	14,145	-36,695	25,399	1,316,978
2055	72	47,666	14,062	-36,479	25,249	1,342,227
2056	73	47,385	13,979	-36,264	25,100	1,367,327
2057	74	47,106	13,896	-36,050	24,952	1,392,279



Table 8 (Cont.)

PRESENT VALUE OF FUTURE WAGES AND BENEFITS  
2008 - 2064

YEAR	AGE	WAGES	EMPLOYEE BENEFITS	PERSONAL CONSUMPTION	TOTAL	CUMULATE
****	***	*****	*****	*****	*****	*****
2058	75	46,828	13,814	-35,837	24,805	1,417,084
2059	76	46,552	13,733	-35,626	24,659	1,441,743
2060	77	46,278	13,652	-35,416	24,514	1,466,257
2061	78	46,005	13,572	-35,208	24,369	1,490,626
2062	79	45,733	13,491	-35,000	24,224	1,514,850
2063	80	45,464	13,412	-34,794	24,082	1,538,932
2064	81	27,058	7,982	-20,708	14,332	\$1,553,264
PARADI		\$2,965,506	\$874,827	-\$2,287,069	\$1,553,264	

Table 9

PRESENT VALUE OF NET WAGES AND BENEFITS  
2007 - 2064

YEAR	AGE	WAGES	EMPLOYEE BENEFITS	PERSONAL CONSUMPTION	TOTAL	CUMULATE
****	***	*****	*****	*****	*****	*****
2007	24	\$23,191	\$4,061	-\$12,514	\$14,738	\$14,738
2008	25	43,813	12,926	-39,830	16,909	31,647
2009	26	46,706	13,778	-39,799	20,685	52,332
2010	27	49,952	14,736	-42,563	22,125	74,457
2011	28	53,423	15,760	-43,032	26,151	100,608
2012	29	57,136	16,855	-46,023	27,968	128,576
2013	30	61,107	18,026	-46,765	32,368	160,944
2014	31	60,747	17,921	-46,490	32,178	193,122
2015	32	60,389	17,815	-46,216	31,988	225,110
2016	33	60,032	17,709	-45,942	31,799	256,909
2017	34	59,678	17,605	-45,672	31,611	288,520
2018	35	59,327	17,501	-45,403	31,425	319,945
2019	36	58,977	17,398	-45,135	31,240	351,185
2020	37	58,629	17,295	-44,869	31,055	382,240
2021	38	58,283	17,193	-44,604	30,872	413,112
2022	39	57,940	17,092	-44,342	30,690	443,802
2023	40	57,598	16,991	-44,080	30,509	474,311
2024	41	57,259	16,891	-43,820	30,330	504,641
2025	42	56,922	16,792	-43,562	30,152	534,793
2026	43	56,586	16,693	-43,305	29,974	564,767
2027	44	56,252	16,594	-43,050	29,796	594,563
2028	45	55,921	16,497	-42,796	29,622	624,185
2029	46	55,591	16,400	-42,544	29,447	653,632
2030	47	55,263	16,303	-42,293	29,273	682,905
2031	48	54,937	16,207	-42,043	29,101	712,006
2032	49	54,613	16,111	-41,796	28,928	740,934
2033	50	54,291	16,016	-41,548	28,759	769,693
2034	51	53,970	15,921	-41,304	28,587	798,280
2035	52	53,652	15,827	-41,060	28,419	826,699
2036	53	53,336	15,734	-40,818	28,252	854,951
2037	54	53,022	15,642	-40,577	28,087	883,038
2038	55	52,708	15,549	-40,338	27,919	910,957
2039	56	52,398	15,458	-40,101	27,755	938,712
2040	57	52,088	15,366	-39,863	27,591	966,303
2041	58	51,781	15,276	-39,628	27,429	993,732
2042	59	51,476	15,186	-39,394	27,268	1,021,000
2043	60	51,172	15,096	-39,162	27,106	1,048,106
2044	61	50,870	15,007	-38,931	26,946	1,075,052
2045	62	50,571	14,918	-38,702	26,787	1,101,839
2046	63	50,273	14,830	-38,474	26,629	1,128,468
2047	64	49,976	14,743	-38,247	26,472	1,154,940
2048	65	49,681	14,656	-38,021	26,316	1,181,256
2049	66	49,389	14,570	-37,797	26,162	1,207,418
2050	67	49,097	14,484	-37,574	26,007	1,233,425
2051	68	48,807	14,398	-37,352	25,853	1,259,278
2052	69	48,519	14,313	-37,132	25,700	1,284,978
2053	70	48,234	14,229	-36,913	25,550	1,310,528
2054	71	47,949	14,145	-36,695	25,399	1,335,927
2055	72	47,666	14,062	-36,479	25,249	1,361,176
2056	73	47,385	13,979	-36,264	25,100	1,386,276

Table 9 (Cont.)

PRESENT VALUE OF NET WAGES AND BENEFITS  
2007 - 2064

YEAR	AGE	WAGES	EMPLOYEE BENEFITS	PERSONAL CONSUMPTION	TOTAL	CUMULATE
****	***	*****	*****	*****	*****	*****
2057	74	47,106	13,896	-36,050	24,952	1,411,228
2058	75	46,828	13,814	-35,837	24,805	1,436,033
2059	76	46,552	13,733	-35,626	24,659	1,460,692
2060	77	46,278	13,652	-35,416	24,514	1,485,206
2061	78	46,005	13,572	-35,208	24,369	1,509,575
2062	79	45,733	13,491	-35,000	24,224	1,533,799
2063	80	45,464	13,412	-34,794	24,082	1,557,881
2064	81	27,058	7,982	-20,708	14,332	\$1,572,213
PARADI		\$2,999,607	\$882,107	-\$2,309,501	\$1,572,213	

Table 10

LOSS OF PAST GUIDANCE TO BODO  
2007 - 2008

YEAR	AGE	RELATIONSHIP	CUMULATE
****	***	*****	*****
2007	59	\$1,343	\$1,343
2008	60	407	\$1,750
PARADY		\$1,750	

Table 11

PRESENT VALUE OF FUTURE GUIDANCE TO BODO  
2008 - 2028

YEAR	AGE	RELATIONSHIP	DISCOUNT FACTOR	PRESENT VALUE	CUMULATE
****	***	*****	*****	*****	*****
2008	60	\$1,245	0.98699	\$1,228	\$1,228
2009	61	1,671	0.97001	1,621	2,849
2010	62	1,690	0.95333	1,611	4,460
2011	63	1,709	0.93693	1,601	6,061
2012	64	1,729	0.92082	1,592	7,653
2013	65	1,749	0.90498	1,583	9,236
2014	66	1,769	0.88942	1,573	10,809
2015	67	1,789	0.87412	1,564	12,373
2016	68	1,810	0.85908	1,555	13,928
2017	69	1,831	0.84431	1,546	15,474
2018	70	1,852	0.82979	1,537	17,011
2019	71	1,873	0.81552	1,527	18,538
2020	72	1,895	0.80149	1,519	20,057
2021	73	1,917	0.78771	1,510	21,567
2022	74	1,939	0.77416	1,501	23,068
2023	75	1,961	0.76084	1,492	24,560
2024	76	1,984	0.74776	1,484	26,044
2025	77	2,007	0.73490	1,475	27,519
2026	78	2,030	0.72226	1,466	28,985
2027	79	2,053	0.70983	1,457	30,442
2028	80	1,747	0.69954	1,222	\$31,664

BODO PARADY

\$31,664

Table 12

PRESENT VALUE OF NET GUIDANCE TO BODO  
2007 - 2028

YEAR	AGE	RELATIONSHIP	CUMULATE
****	***	*****	*****
2007	59	\$1,343	\$1,343
2008	60	1,635	2,978
2009	61	1,621	4,599
2010	62	1,611	6,210
2011	63	1,601	7,811
2012	64	1,592	9,403
2013	65	1,583	10,986
2014	66	1,573	12,559
2015	67	1,564	14,123
2016	68	1,555	15,678
2017	69	1,546	17,224
2018	70	1,537	18,761
2019	71	1,527	20,288
2020	72	1,519	21,807
2021	73	1,510	23,317
2022	74	1,501	24,818
2023	75	1,492	26,310
2024	76	1,484	27,794
2025	77	1,475	29,269
2026	78	1,466	30,735
2027	79	1,457	32,192
2028	80	1,222	\$33,414

PARADY                    \$33,414



Table 13

LOSS OF PAST GUIDANCE TO MARY  
2007 - 2008

YEAR	AGE	RELATIONSHIP	CUMULATE
****	***	*****	*****
2007	56	\$1,343	\$1,343
2008	57	407	\$1,750
MOORE		\$1,750	

Table 14

PRESENT VALUE OF FUTURE GUIDANCE TO MARY  
2008 - 2034

YEAR	AGE	RELATIONSHIP	DISCOUNT FACTOR	PRESENT VALUE	CUMULATE
****	***	*****	*****	*****	*****
2008	57	\$1,245	0.98699	\$1,228	\$1,228
2009	58	1,671	0.97001	1,621	2,849
2010	59	1,690	0.95333	1,611	4,460
2011	60	1,709	0.93693	1,601	6,061
2012	61	1,729	0.92082	1,592	7,653
2013	62	1,749	0.90498	1,583	9,236
2014	63	1,769	0.88942	1,573	10,809
2015	64	1,789	0.87412	1,564	12,373
2016	65	1,810	0.85908	1,555	13,928
2017	66	1,831	0.84431	1,546	15,474
2018	67	1,852	0.82979	1,537	17,011
2019	68	1,873	0.81552	1,527	18,538
2020	69	1,895	0.80149	1,519	20,057
2021	70	1,917	0.78771	1,510	21,567
2022	71	1,939	0.77416	1,501	23,068
2023	72	1,961	0.76084	1,492	24,560
2024	73	1,984	0.74776	1,484	26,044
2025	74	2,007	0.73490	1,475	27,519
2026	75	2,030	0.72226	1,466	28,985
2027	76	2,053	0.70983	1,457	30,442
2028	77	2,077	0.69763	1,449	31,891
2029	78	2,101	0.68563	1,441	33,332
2030	79	2,125	0.67384	1,432	34,764
2031	80	2,149	0.66225	1,423	36,187
2032	81	2,174	0.65086	1,415	37,602
2033	82	2,199	0.63966	1,407	39,009
2034	83	1,920	0.63015	1,210	\$40,219

MARY MOORE

\$40,219

Table 15

PRESENT VALUE OF NET GUIDANCE TO MARY  
2007 - 2034

YEAR	AGE	RELATIONSHIP	CUMULATE
****	***	*****	*****
2007	56	\$1,343	\$1,343
2008	57	1,635	2,978
2009	58	1,621	4,599
2010	59	1,611	6,210
2011	60	1,601	7,811
2012	61	1,592	9,403
2013	62	1,583	10,986
2014	63	1,573	12,559
2015	64	1,564	14,123
2016	65	1,555	15,678
2017	66	1,546	17,224
2018	67	1,537	18,761
2019	68	1,527	20,288
2020	69	1,519	21,807
2021	70	1,510	23,317
2022	71	1,501	24,818
2023	72	1,492	26,310
2024	73	1,484	27,794
2025	74	1,475	29,269
2026	75	1,466	30,735
2027	76	1,457	32,192
2028	77	1,449	33,641
2029	78	1,441	35,082
2030	79	1,432	36,514
2031	80	1,423	37,937
2032	81	1,415	39,352
2033	82	1,407	40,759
2034	83	1,210	\$41,969
MOORE		\$41,969	

Table 16

LOSS OF PAST ACCOMPANIMENT TO BODO  
2007 - 2008

YEAR	AGE	RELATIONSHIP	CUMULATE
****	***	*****	*****
2007	59	\$2,700	\$2,700
2008	60	819	\$3,519
PARADY		\$3,519	

Table 17

PRESENT VALUE OF FUTURE ACCOMPANIMENT TO BODO  
2008 - 2028

YEAR	AGE	RELATIONSHIP	DISCOUNT FACTOR	PRESENT VALUE	CUMULATE
****	***	*****	*****	*****	*****
2008	60	\$2,503	0.98699	\$2,470	\$2,470
2009	61	3,360	0.97001	3,259	5,729
2010	62	3,399	0.95333	3,240	8,969
2011	63	3,438	0.93693	3,221	12,190
2012	64	3,478	0.92082	3,203	15,393
2013	65	3,518	0.90498	3,184	18,577
2014	66	3,558	0.88942	3,165	21,742
2015	67	3,599	0.87412	3,146	24,888
2016	68	3,640	0.85908	3,127	28,015
2017	69	3,682	0.84431	3,109	31,124
2018	70	3,724	0.82979	3,090	34,214
2019	71	3,767	0.81552	3,072	37,286
2020	72	3,810	0.80149	3,054	40,340
2021	73	3,854	0.78771	3,036	43,376
2022	74	3,898	0.77416	3,018	46,394
2023	75	3,943	0.76084	3,000	49,394
2024	76	3,988	0.74776	2,982	52,376
2025	77	4,034	0.73490	2,965	55,341
2026	78	4,080	0.72226	2,947	58,288
2027	79	4,127	0.70983	2,929	61,217
2028	80	3,511	0.69954	2,456	\$63,673

BODO PARADY

\$63,673

Table 18

PRESENT VALUE OF NET ACCOMPANIMENT TO BODO  
2007 - 2028

YEAR	AGE	RELATIONSHIP	CUMULATE
****	***	*****	*****
2007	59	\$2,700	\$2,700
2008	60	3,289	5,989
2009	61	3,259	9,248
2010	62	3,240	12,488
2011	63	3,221	15,709
2012	64	3,203	18,912
2013	65	3,184	22,096
2014	66	3,165	25,261
2015	67	3,146	28,407
2016	68	3,127	31,534
2017	69	3,109	34,643
2018	70	3,090	37,733
2019	71	3,072	40,805
2020	72	3,054	43,859
2021	73	3,036	46,895
2022	74	3,018	49,913
2023	75	3,000	52,913
2024	76	2,982	55,895
2025	77	2,965	58,860
2026	78	2,947	61,807
2027	79	2,929	64,736
2028	80	2,456	\$67,192

PARADY	\$67,192
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Table 19

LOSS OF PAST ACCOMPANIMENT TO MARY  
2007 - 2008

YEAR	AGE	RELATIONSHIP	CUMULATE
****	***	*****	*****
2007	56	\$2,700	\$2,700
2008	57	819	\$3,519
MOORE		\$3,519	

Table 20

PRESENT VALUE OF FUTURE ACCOMPANIMENT TO MARY  
2008 - 2034

YEAR	AGE	RELATIONSHIP	DISCOUNT FACTOR	PRESENT VALUE	CUMULATE
****	***	*****	*****	*****	*****
2008	57	\$2,503	0.98699	\$2,470	\$2,470
2009	58	3,360	0.97001	3,259	5,729
2010	59	3,399	0.95333	3,240	8,969
2011	60	3,438	0.93693	3,221	12,190
2012	61	3,478	0.92082	3,203	15,393
2013	62	3,518	0.90498	3,184	18,577
2014	63	3,558	0.88942	3,165	21,742
2015	64	3,599	0.87412	3,146	24,888
2016	65	3,640	0.85908	3,127	28,015
2017	66	3,682	0.84431	3,109	31,124
2018	67	3,724	0.82979	3,090	34,214
2019	68	3,767	0.81552	3,072	37,286
2020	69	3,810	0.80149	3,054	40,340
2021	70	3,854	0.78771	3,036	43,376
2022	71	3,898	0.77416	3,018	46,394
2023	72	3,943	0.76084	3,000	49,394
2024	73	3,988	0.74776	2,982	52,376
2025	74	4,034	0.73490	2,965	55,341
2026	75	4,080	0.72226	2,947	58,288
2027	76	4,127	0.70983	2,929	61,217
2028	77	4,174	0.69763	2,912	64,129
2029	78	4,222	0.68563	2,895	67,024
2030	79	4,271	0.67384	2,878	69,902
2031	80	4,320	0.66225	2,861	72,763
2032	81	4,370	0.65086	2,844	75,607
2033	82	4,420	0.63966	2,827	78,434
2034	83	3,858	0.63015	2,431	\$80,865
MARY MOORE				\$80,865	



Table 21

PRESENT VALUE OF NET ACCOMPANIMENT TO MARY  
2007 - 2034

YEAR	AGE	RELATIONSHIP	CUMULATE
****	***	*****	*****
2007	56	\$2,700	\$2,700
2008	57	3,289	5,989
2009	58	3,259	9,248
2010	59	3,240	12,488
2011	60	3,221	15,709
2012	61	3,203	18,912
2013	62	3,184	22,096
2014	63	3,165	25,261
2015	64	3,146	28,407
2016	65	3,127	31,534
2017	66	3,109	34,643
2018	67	3,090	37,733
2019	68	3,072	40,805
2020	69	3,054	43,859
2021	70	3,036	46,895
2022	71	3,018	49,913
2023	72	3,000	52,913
2024	73	2,982	55,895
2025	74	2,965	58,860
2026	75	2,947	61,807
2027	76	2,929	64,736
2028	77	2,912	67,648
2029	78	2,895	70,543
2030	79	2,878	73,421
2031	80	2,861	76,282
2032	81	2,844	79,126
2033	82	2,827	81,953
2034	83	2,431	\$84,384
MOORE		\$84,384	